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**VIA E-FILING**

The Honorable Maryellen Noreika  
District Court of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Street, Unit 31, Room 4124  
Wilmington, Delaware 19801-3555

Re: *Official Committee of Unsecured Creditors of Cred, Inc. v. James Alexander*, No. 21-cv-417

Dear Judge Noreika:

We write on behalf of the Cred Inc. Liquidation Trust, as successor-in-interest to the Official Committee of Unsecured Creditors of Cred Inc., to advise the Court of a hearing this morning before the Honorable John T. Dorsey of the Bankruptcy Court for the District Court of Delaware. The hearing concerned Mr. James Alexander's refusal to continue his February 9, 2021 deposition prior to the resolution of the motion for contempt pending before this Court (ECF No. 2 (the "Contempt Motion")).

During the hearing, Judge Dorsey stated that Mr. Alexander's deposition should go forward on Thursday, May 13, 2021, and suggested that the May 6, 2021 Contempt Motion hearing before this Court be adjourned pending the completion of Mr. Alexander's deposition. (*See Cred Inc., et al.*, No. 20-12836, ECF No. 752 (Bankr. D. Del. May 4, 2021) (Minute Order) ("Teleconference Held Re: Discovery Dispute; deposition to take place on 5/13/2021; contempt motion to be adjourned to a date TBD"); *see also* May 4, 2021 Hr'g Tr. at 9 ("THE COURT: Alright, so we have that [deposition] set [for] Thursday of next week. I guess you will have to move the contempt motion again until after he sits for that deposition and go forward from there."))

Accordingly, we respectfully request that the Court adjourn the May 6, 2021 Contempt Motion hearing for a period of two weeks, or as soon thereafter as the Court may be available. We have conferred with counsel for Mr. Alexander, who indicated that Mr. Alexander does not oppose this request for an adjournment.

Respectfully submitted,

/s/ *Ethan H. Townsend*

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cc: David R. Hurst  
Timothy W. Walsh  
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